

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

JURY TRIAL DEMANDED

**DECLARATION OF ANDREW S. ONG IN OPPOSITION TO TQ DELTA, LLC'S
MOTIONS FOR SUMMARY JUDGMENT DIRECTED TO
PATENT FAMILIES 1 AND 10**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit R** is a true and correct copy of excerpts from the Responsive Expert Report of Dr. Naofal Al-Dhahir Regarding Family 10, served November 18, 2022.

3. Attached hereto as **Exhibit S** is a true and correct copy of excerpts from the Responsive Expert Report of Dr. Leonard J. Cimini, Jr. on Infringement of the Family 1 and 4 Patents, served November 18, 2022.

4. Attached hereto as **Exhibit T** is a true and correct copy of excerpts from the July 28, 2022 Deposition Transcript of Benjamin Miller.

5. Attached hereto as **Exhibit U** is a true and correct copy of Product Documentation for the 5268AC.

6. Attached hereto as **Exhibit V** is a true and correct copy of excerpts from the G.993.2 (February 2019), Very High Speed Digital Subscriber Line Transceivers 2 (VDSL2).

7. Attached hereto as **Exhibit W** is a true and correct copy of the September 2, 2022 Email – Request to Meet-and-Confer on Invalidity Reports and Elections.

8. Attached hereto as **Exhibit X** is a true and correct copy of excerpts from the August 25, 2022 Deposition Transcript of Raphael Cassiers.

9. Attached hereto as **Exhibit Y** is a true and correct copy of excerpts from the Responsive Expert Report of Walter Overby Regarding [REDACTED]
[REDACTED] served November 18, 2022.

10. Attached hereto as **Exhibit Z** is a true and correct copy of excerpts from the Opening Expert Report of Todor Cooklev, Ph.D, served August 19, 2022.

11. Attached hereto as **Exhibit AA** is a true and correct copy of excerpts from the December 1, 2022 Deposition Transcript of Arthur Brody.

12. Attached hereto as **Exhibit BB** is a true and correct copy of excerpts from the December 2, 2022 Deposition Transcript of Mark Reid Lanning.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on
January 6, 2022, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong

